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February 10, 2021

VIA ELECTRONIC CASE FILING

Hon. John Michael Vazquez, U.S.D.J.
UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
Martin Luther King Building & U.S. Courthouse
50 Walnut Street, Room 4015
Newark, NJ 07101

Re: *Integrated Orthopedics Inc. v. UnitedHealth Group*
Case No.: 11-cv-425 (ES) (CLW)

Dear Judge Vazquez:

Our firm, along with Zuckerman Spaeder LLP, is Class Counsel for Plaintiff in the above-referenced matter. Together with Defendants, we write jointly to request the adjustment of one deadline set forth in the Court's October 15, 2020 Findings and Order Granting Preliminary Approval to Proposed Settlement, Approving Form and Dissemination of Class Notice, and Setting Date for Hearing on Final Approval Order (Dkt. 423) (the "Preliminary Approval Order").

The Preliminary Approval Order directs that any responses to objections to the proposed settlement be filed no more than 14 days before the Fairness Hearing, and for Plaintiff to file its motion for final approval no more than 7 days before the Fairness Hearing. Dkt. 423 ¶ 10.

One objection to the settlement was filed. Under the current schedule, as modified by the Court on February 9 (Dkt. 426) (moving fairness hearing to February 25, 2021), responses to the objection are due on February 11. Class Counsel have been conferring with counsel for the objector. Those discussions are ongoing and may result in resolution or withdrawal of the objection. To give the parties more time to address the objection with the objector, the parties respectfully request that the objection response date be moved to match the February 18 deadline for Plaintiff's submission of the motion for final approval. If necessary, Plaintiff will respond to the objection as part of that motion and Defendants may also respond to the objection at that time. Because the ongoing discussions may resolve the objection, and neither the objector nor any other party will be prejudiced by this adjustment to the schedule, good cause exists for the



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requested modification.

The parties jointly and respectfully request that the Court so order the requested adjustment to the Preliminary Approval Order.

Thank you in advance for Your Honor's consideration.

Respectfully submitted,

BUTTACI LEARDI & WERNER, LLC

/s/ John W. Leardi

John W. Leardi
A Member of the Firm

JWL/

cc: All Counsel of Record (*via electronic mail only*)

IT IS SO ORDERED THIS 11TH DAY OF FEBRUARY 2021

A handwritten signature in blue ink, appearing to read 'John Michael Vazquez', is written over a horizontal line.

John Michael Vazquez, U.S.D.J.
United States District Judge